

# **Exhibit E**

Warren Wolf

**From:** rory tringali <[rorytringali@me.com](mailto:rorytringali@me.com)>  
**Date:** April 3, 2014 10:09:27 PM EDT  
**To:** Moreno <[lasermmoreno@gmail.com](mailto:lasermmoreno@gmail.com)>  
**Subject:** tax returns great for iIRS

Hope you reported well you and pussy in Austin



# **Exhibit F**

LAW OFFICE OF  
GOLDBERG & WOLF, L.L.C.

WARBN S. WOLP\*  
JORDAN B. GOLDBERG\*  
JONATHAN M. ROMVARY\*

1949 BERLIN ROAD  
SUITE 201  
CHERRY HILL, NEW JERSEY  
08003

\*MEMBER NJ & PA BARS

856-651-1600  
FAX 856-651-1615

April 28, 2014

VIA EMAIL (lawrence.leven@gmail.com),  
FACSIMILE (973-228-4496)  
AND FIRST CLASS MAIL

Lawrence A. Leven, Esquire  
175 Fairfield Avenue, Unit 1C  
West Caldwell, New Jersey 07006

Re: Rory Tringali/ Medpro, Inc.

Dear Larry:

We are writing in an effort to mitigate damages Mr. Tringali is causing to Medpro, Inc, through his harassment of its principal, Mike Moreno, tortious interference with its business relations, libel and breach of the non-disparagement clause in the settlement agreement. We understand Mr. Tringali has parted ways with Justin Williams, but do not understand why Mr. Tringali is bringing Medpro into it.

Your client emails Mr. Moreno copies of Medpro tax returns Mr. Tringali obtained through discovery after Mr. Tringali was indicted for multiple felonies. Your client advises people that he sits outside Mr. Moreno's house and observes his family activities. Your client emails Mr. Moreno assessment valuations and other details of Mr. Moreno's home. This conduct is clearly intended to harass our client and appears criminal in my opinion.

Your client has been emailing Medpro's customers and advising them that Medpro is a scammer and rips off its customers. This is untrue, defamatory and casting our client in a negative light. The settlement agreement requires Mr. Tringali to pay \$5000 per occurrence of this.

Your client has improperly obtained emails involving our client and posted them on a website he built to tarnish the reputations of Justin Williams and his wife. This appears to be a further effort to harass, defame and disparage our client.

Demand is hereby made that your client CEASE and DESIST from (1) further contacting Mr. Moreno (2) attempting to cast Medpro and/or Mr. Moreno in a negative light to Medpro's associates, clients or the general public and (3) posting any information about Medpro or Mr.

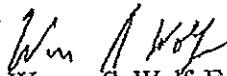
Lawrence A. Leven, Esquire  
April 28, 2014  
page 2

Moreno on your client's Justin Williams attack website or anywhere else on the internet.

We do not know what your client seeks to obtain by this conduct other than finding himself a defendant in a new lawsuit. In addition to the \$5000 per occurrence remedy, your client's conduct may be deemed a material breach of the settlement agreement which would void the release for the internet email bombs he orchestrated and the other allegations in the federal lawsuit. Kindly be advised our client reserves all rights to seek all damages arising from Mr. Tringali's conduct.

If you are interested in resolving this amicable, please contact me immediately.

Sincerely,

  
Warren S. Wolf, Esquire  
GOLDBERG & WOLF, LLC

cc: Kenneth R. Sharpe, D.A.G.  
Medpro, Inc.

LAW OFFICES  
**GOLDBERG & WOLF, LLC**

WARREN S. WOLF\*  
JORDAN B. GOLDBERG\*  
JONATHAN M. ROMVARY\*  
1949 BERLIN ROAD  
SUITE 201  
CHERRY HILL, NEW JERSEY 08003

\*MEMBER NJ & PA BARS  
856.651.1600  
FAX 856.651.1615

FACSIMILE TRANSMISSION SHEET

DATE: April 28, 2014

TO: Lawrence A. Leven, Esquire

FAXNO: 973-228-4496

RE: Rory Tringali/ Medpro, Inc.

FROM: WARREN S. WOLF, ESQUIRE

COMMENTS: Please see attached.

TOTAL PAGES INCLUDING COVER PAGE: 3 PAGES

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P. 1

## \* \* \* Communication Result Report (Apr. 28, 2014 12:34PM) \* \* \*

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Date/Time: Apr. 28, 2014 12:32PM

File No. / Mode	Destination	Pg(s)	Result	Page Not Sent
2648 Memory TX	19732284496	P. 3	OK	

Reason for error

E. 1) Hang up or line fail	E. 2) Busy
E. 3) No answer	E. 4) No facsimile connection
E. 5) Exceeded max. E-mail size	E. 6) Destination does not support IP-Fax

LAW OFFICES  
**GOLDBERG & WOLF, LLC**  
 WARREN & WOLF  
 ANDREW GOLDBERG  
 100 BROADWAY  
 NEW YORK, NY 10006  
 212.335.1100  
 FAX 212.335.1113

FACSIMILE TRANSMISSION SHEET

DATE: April 28, 2014  
 TO: Lazarus A. Letow, Esquire  
 FAX NO: 973-228-4496  
 RE: Ray Trigilio MD, DO  
 FROM: WARREN & WOLF, ESQUIRE  
 COMMENTS: Please see attached.

TOTAL PAGES INCLUDING COVER PAGE: 3 PAGES

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# **Exhibit G**

**Warren Wolf**

**From:** Alicia Amoroso  
**Sent:** Monday, April 28, 2014 3:09 PM  
**To:** Warren Wolf  
**Subject:** FW: Rory Tringali/Medpro, Inc.

**From:** lawrence leven [mailto:[lawrence.leven@gmail.com](mailto:lawrence.leven@gmail.com)]  
**Sent:** Monday, April 28, 2014 3:05 PM  
**To:** Alicia Amoroso  
**Subject:** Re: Rory Tringali/Medpro, Inc.

Dear Warren,

I received your email / fax. Rory is out of the country, I believe he will be returning this weekend. I have sent a copy of your letter to him. Upon his return I will discuss the contents of the letter.

On Mon, Apr 28, 2014 at 12:39 PM, Alicia Amoroso <[AliciaAmoroso@goldbergwolf.com](mailto:AliciaAmoroso@goldbergwolf.com)> wrote:

Dear Mr. Leven,

Please find attached hereto correspondence with regard to the above-referenced matter. If you do not receive the attachment, please contact the undersigned.

Thank you,

**Alicia Amoroso**

Legal Assistant to the Law Office of  
Goldberg & Wolf, LLC

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GOLDBERG & WOLF, LLC.

1949 Berlin Road

Suite 201

Cherry Hill, New Jersey 08003

Ph 856-651-1600 x-307 Fax 856-651-1615

E-mail: aliciaamoroso@goldbergwolf.com

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If you are not the intended recipient, please advise the sender immediately.

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Lawrence Leven Attorney At Law  
175 Fairfield Avenue, Suite 1C  
West Caldwell, NJ 07006  
1-973-228-5926 Tel.  
1-973-228-4496 Fax  
Email: Lawrence.leven@gmail.com

# **Exhibit H**

**Warren Wolf**

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**From:** Warren Wolf  
**Sent:** Monday, April 28, 2014 5:12 PM  
**To:** 'lawrence.leven@gmail.com'  
**Subject:** tringali/medpro

Larry,

I appreciate the call and your representation that Mr. Tringall will not send any disparaging emails this week until you and he have a chance to discuss same after he returns from his trip. However, my client continues to be disparaged through his website <http://justin-williams-brooke-horan-williams-laser-fraud-crooks.com> which falsely claims Moreno and Medpro are partners with Williams. If your client does not remove any and all references to Moreno and Medpro from this website within 24 hours, we will file a lawsuit and seek injunctive relief. As part of an effort to "keep the peace" this week until Tringall returns, please ask him to take all references to Moreno and Medpro off the website immediately.

Assuming all Medpro and Moreno content are immediately removed and nothing else is sent out this week, my client and I will be happy to discuss Tringall's concerns with Moreno in an effort to reach an amicable resolution.

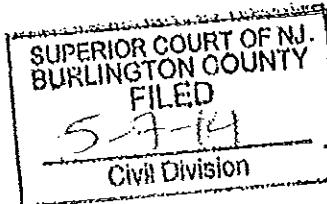
Warren S. Wolf, Esquire  
GOLDBERG & WOLF, LLC  
1949 Berlin Road, Suite 201  
Cherry Hill, New Jersey 08003  
Ph 856-651-1600 Fax 856-651-1615  
[wwolf@goldbergwolf.com](mailto:wwolf@goldbergwolf.com)

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# **Exhibit 2**

Warren S. Wolf, Esquire  
**GOLDBERG & WOLF, LLC**  
1949 Berlin Road, Suite 201  
Cherry Hill, NJ 08003  
856-651-1600  
Attorneys for Plaintiffs



MICHAEL MORENO AND MEDPRO, INC. Plaintiffs, v. RORY E. TRINGALI Defendant.	SUPERIOR COURT OF NEW JERSEY BURLINGTON COUNTY CHANCERY DIVISION C-32-14 PLAINTIFFS' MEMORANDUM OF LAW IN SUPPORT OF ORDER TO SHOW CAUSE
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#### STATEMENT OF FACTS

The facts contained within the Verified Complaint and incorporated herein and not repeated for the sake of brevity.

#### LEGAL ARGUMENT

##### A. PRELIMINARY INJUNCTION IS APPROPRIATE IN THIS CASE

Preliminary injunctive relief is appropriate when: (1) the granting of such relief is necessary to prevent irreparable harm to the plaintiff; (2) the applicable underlying law is well settled; (3) the plaintiff has made a preliminary showing of reasonable probability of success on the merits; and (4) the inconvenience or loss to the opposing party will be minimal. Crowe v. DeGolia, 90 N.J. 126, 132-134 (1982). A preliminary injunction is issued to preserve the subject matter of the controversy pending the determination of the controversy at a final hearing. Poff v. Caro, 228 N.J. Super. 370, 375 (Law Div. 1987).

COPY

1. Plaintiffs Will Continue to Suffer Irreparable Harm if the Preliminary Injunction is not Granted

"Irreparable harm" is generally defined in equity as the type of harm "that cannot be redressed adequately by monetary damages." Crowe, 90 N.J. at 132-33. The inadequacy of money damages depends on the "nature of the injury or the right affected." Id. at 133. When damages cannot be quantified, such harm is considered irreparable. See, e.g., J.H. Renarde, Inc. v. Sims, 312 N.J. Super, 195, 203 (Ch. Div. 1998); Nat'l Starch and Chem. Corp. v. Parker Chem. Corp., 219 N.J. Super, 158, 163 (App. Div. 1987); United Board and Carton Corp. v. Britting, 63 N.J. Super, 340 (App. Div. 1960).

To this end, diversion of a company's customers may constitute irreparable harm. J.L. Kislak, Inc. v. Artof, 13 N.J. Misc. 129, 132 (Ct. Ch. 1935). This is so because the extent of the injury to the business as a result of this type of conduct cannot be readily ascertained, and as such, does not lend itself to a straightforward calculation of money damages. Samsung Am., Inc. v. Park, 2006 WL 3627072, \*15 (N.J. App. Div. December 11, 2006). See also Pappani Enter., Inc. v. Hardee's Food Sys., Inc., 143 F.3d 800, 805 (3d Cir. 1998) ("Grounds for irreparable injury include loss of control of reputation, loss of trade, and loss of goodwill."); Opticians Ass'n v. Indep. Opticians, 920 F.2d 187, 195 (3d Cir. 1990) (same). In a competitive industry where consumers are loyal, we believe that loss of market share is a "potential harm which cannot be redressed by a legal or an equitable remedy following a trial." Instant Air Freight, 882 F.2d at 801. As a result of the conduct of the Defendant, Plaintiffs have suffered, and will continue to suffer, irreparable harm. Plaintiffs' customer base includes the recipients of Defendant's defamatory emails. Plaintiffs' customers and potential customers constantly search the internet to evaluate whether to do business with the Plaintiffs prior to purchasing their products. Such present and

future customers will inevitably find the Defendants malicious attack website. The emails and website contact cause Plaintiffs to lose business and tarnish their reputations. Such a loss cannot be readily ascertained, and therefore, does "not lend itself to a straight calculation of money damages." Samsung Am., Inc., 2006 WL 3627072, at \*15. There is no way to determine how many sales Plaintiffs have lost because potential customers went elsewhere after reading the Defendant's attack website.

Defendants' tormenting of the Plaintiffs with email, texts and unwanted visits to his home constitutes additional irreparable harm. Defendant's twisted use of the Plaintiff's tax returns Defendant obtained from the State in his criminal case serve no purpose, but to intentionally inflict emotional distress on the Plaintiffs. Such malicious conduct cannot be compensated with monetary damages.

2. The Underlying Law is Well-Settled

If a competitor uses unlawful means to compete, then it can be liable for unfair competition, C.R. Bard, Inc. v. Wordtronics Corp., 235 N.J. Super 168, 174 (Law Div. 1989). "Unlawful means" may include fraud, intimidation, misrepresentation, threats of civil or criminal action, or other violations of the law. *Id.* (citing McCue v. Deppert, 21 N.J. Super 591, 595-96 (App. Div. 1952)). To this end, the tort of interference with existing or prospective business relations is well-settled. The New Jersey Supreme Court set forth the elements of such a claim:

- 1) plaintiff must have had a reasonable expectation of economic advantage;
- 2) defendant must have interfered with intentionally and with malice;

- 3) defendant's interference must have caused the loss of Plaintiff's prospective gain; and
- 4) the injury must have caused damage.

EZ Sockets, Inc. v. Brighton-Best Socket Screw Mfg, Inc., 307 N.J. Super. 546, 558 (1996)(citing Printing Mart v. Sharp Electronics, 116 N.J. 739, 351 (1980)). While it is true that a business may induce a third party not to do business with a competitor, it may not use wrongful means to do so. Id. at 559.

The law is well-settled in this area and Plaintiffs are entitled to relief: Defendant's tactic of falsely advising Plaintiffs' customers via email and his attack website that Plaintiffs rip 'people off and commit frauds is defamatory and violates the Confidential Settlement Agreement entered into by the parties. There is no justification Defendant can offer for such hateful conduct or Defendant's intentional infliction of emotional distress upon Plaintiffs.

### 3. Plaintiff Has Established a Likelihood of Success on the Merits of Its Claims

Plaintiffs have established that Defendant made defamatory statements about it to customers of Plaintiffs' product and Plaintiffs' business associates, and has threatened, bullied and strong-armed Plaintiff presumably in an effort to scare him out of the business. Defendant has tortiously interfered with Plaintiffs' business relationships. There is no valid defense to this claim. The malicious attack website is presumably causing Plaintiffs to lose customers they do not even know about and will likely be unable to prove financial losses resulting from the attack website.

In short, Plaintiff is likely to succeed on the merits of its claims. As such, a preliminary injunction should be entered in Plaintiffs' favor.

4. The Equities Balance in Favor of Plaintiff

A balancing of the equities favors the Plaintiff. If Defendant is enjoined from defaming Plaintiffs and contacting the Plaintiffs and their customers, virtually no harm will occur to the Defendant. On the other hand, if Defendant is permitted to continue to threaten and intimidate Plaintiffs' customers and business contacts, Plaintiff will, in all likelihood, have its reputation destroyed. Plaintiffs' reputation as an industry leader has been built up over 13 years in the industry. It will be nearly impossible to compensate such a loss of good will with monetary damages. The only way Plaintiffs can compete fairly is for the Defendant to follow the terms of the Settlement Agreement and not cast Plaintiffs in a negative light.

Moreover, if Defendant is restricted from contacting Plaintiffs and stalking out their house and family activities, no loss will come to Defendant. However, if Defendant keeps up his bullying conduct, Plaintiffs have to keep looking over their shoulder for the mafia-style threats contained within Defendant's Vigilantes 4 Justice emails. Equity favors the Plaintiffs.

CONCLUSION

For the foregoing reasons, it is respectfully requested that this Honorable Court enter the Preliminary Injunction requested in the form of order.

GOLDBERG & WOLF, LLC

Dated: 5-6-14

BY:   
Warren S. Wolf, Esquire

# **Exhibit 3**

FILED WITH THE COURT

MAY 12 2014

KAREN L. SUTER, J.S.C.

GOLDBERG & WOLF, LLC  
Warren S. Wolf, Esquire  
1949 Berlin Road, Suite 201  
Cherry Hill, NJ 08003  
856-651-1600  
Attorneys for Plaintiffs

MICHAEL MORENO and MEDPRO, INC.  v.  RORY E. TRINGALI	Plaintiffs,  Defendant(s).	SUPERIOR COURT OF NEW JERSEY BURLINGTON COUNTY CHANCERY DIVISION  C- 082 -14  ORDER TO SHOW CAUSE WITHOUT TEMPORARY RESTRAINTS
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THIS MATTER having been brought before the Court by Warren S. Wolf, Esquire, attorney for Plaintiffs, Michael Moreno and Medpro, Inc., seeking relief by way of preliminary injunction on the return date set forth below pursuant to R.4:52, based upon the facts set forth in the Verified Complaint and Memorandum of Law filed herewith and for good cause shown;

IT IS on this 12 day of May, 2014 ORDERED that Defendant, Rory E. Tringali, appear and show cause before the Superior Court, in Courtroom 1 at the Burlington County Courthouse, <sup>Historic - 120 High Street</sup> 49 Rancocas Road in Mount Holly, New Jersey at 9:00 o'clock in the <sup>AM</sup> ~~noon~~ noon or as soon thereafter as counsel can be heard, on the 23 day of May, 2014 why an order should not be issued preliminarily enjoining, restraining and ordering Rory E. Tringali as follows:

1. Defendant must immediately remove all references to either Plaintiff on the website <http://justin-williams-brooke-horan-williams-laser-fraud-crooks.com> or any other websites upon which the Defendant can control their content.

2. Defendant must cease and desist from defaming the Plaintiffs or attempting to cast the Plaintiffs in a negative light to anyone;
3. Defendant must cease and desist from contacting any of Plaintiffs' customers;
4. Defendant must cease and desist from attempting to contact the Plaintiffs;
5. The Defendant shall not be permitted to be within a one (1) mile radius of the of Moreno's home located at 17 Tuxedo Court, Marlton, New Jersey;
6. Defendants must not defame or disparage Plaintiffs, within the business community.
7. Defendant must immediately delete any posts about the Plaintiffs on any community websites, blogs, industry chat rooms, reviews, etc. which cast either Plaintiff in a negative light.

And IT IS further ORDERED that:

1. A copy of this Order to Show Cause, Verified Complaint and Memorandum of Law and any supporting affidavits or certifications submitted in support of this application may be served upon the Defendant's attorney, Lawrence A. Leven, Esquire, by Federal Express overnight mail at 175 Fairfield Avenue, Unit 1C, West Caldwell, New Jersey 07006 within 3 days of the date hereof, in accordance with R.4:4-3 and R. 4:4-4, this being original process.
2. The Plaintiff must file with the Court its proof of service of the pleadings on the Defendant no later than 7 days before the return date.

3. Defendant shall file and serve a written response to this Order to Show Cause and the request for entry of injunctive relief and proof of service by May 16, 2014. The original documents must be filed with the Clerk of the Superior Court in the county listed above. A list of these offices is attached. You must send a copy of your opposition papers directly to the Judge whose name appears at the bottom of this Order, whose address is 49 Rancocas Road, Mount Holly, New Jersey. You must also send a copy of your opposition papers to Plaintiff's attorney whose name and address appear above. A telephone call will not protect your rights; you must file your opposition and pay the required fee of \$ 135.00 and serve your opposition on your adversary, if you want the Court to hear your opposition to the injunctive relief the Plaintiff is seeking.
4. The Plaintiff must file and serve any written reply to the Defendant's order to show cause opposition by May 19, 2014. The reply papers must be filed with the Clerk of the Superior Court in the county listed above and a copy of the reply papers must be sent directly to the chambers of Judge whose name appears on the bottom of this Order.
5. If any Defendant does not file and serve opposition to this order to show cause, the application will be decided on the papers on the return date and relief may be granted by default as to each defaulting Defendant, provided that the Plaintiff files a proof of service and a proposed form or order timely.
6. If the Plaintiff has not already done so, a proposed form of order addressing the relief sought on the return date (along with a self-addressed return envelope, with

return address and postage) must be submitted to the court no later than three (3) days before the return date.

7. Defendant take notice that the Plaintiff has filed a lawsuit against you in the Superior Court of New Jersey. The Verified Complaint attached to this Order to Show Cause states the basis of the lawsuit. If you dispute this Complaint, you or your attorney, must file a written answer to the Complaint and proof of service within 35 days from the day of service of his order to show cause; not counting the day you receive it.

These documents must be filed with the Clerk of the Superior Court in the county listed above. A list of these offices is provided. Include a \$135.00 filing fee payable to the "Treasurer, State of New Jersey." You must also send a copy of your Answer to the Plaintiff's attorney whose name and address appear above, or to the Plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve your Answer (with the fee) or judgment may be entered against you by default. Please note: Opposition to the Order to Show Cause is not an Answer and you must file both. Please note further: if you do not file and serve an Answer within 35 days of this Order, the Court may enter a default against you for the relief Plaintiff demands.

8. If you cannot afford an attorney, you may call the Legal Services office in the county in which you live. A list of these offices is attached. If you do not have an attorney and are not eligible for free legal assistance you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers

is also provided.

9. The Court will entertain argument, but not testimony, on the return date of the Order to Show Cause, unless the Court and parties are advised to the contrary prior to the return date.

*Karen L. Suter*

Honorable Karen L. Suter, P.J.Ch.

**ATLANTIC COUNTY:**  
 Deputy Clerk of the Superior Court  
 Civil Division, Direct Filing  
 1201 Bacharach Blvd., First Fl.  
 Atlantic City, NJ 08401  
**LAWYER REFERRAL:**  
 (609) 345-3444  
**LEGAL SERVICES:**  
 (609) 348-4200

**BERGEN COUNTY:**  
 Deputy Clerk of the Superior Court  
 Case Processing Section, Room 119  
 Justice Center, 10 Main St.  
 Hackensack, NJ 07601-0769  
**LAWYER REFERRAL:**  
 (210) 488-0044  
**LEGAL SERVICES:**  
 (201) 487-2166

**BURLINGTON COUNTY:**  
 Deputy Clerk of the Superior Court  
 Central Processing Office  
 Attn: Judicial Intake  
 First Fl., Courts Facility  
 49 Rancocas Rd.  
 Mt. Holly, NJ 08060  
**LAWYER REFERRAL:**  
 (609) 261-4862  
**LEGAL SERVICES:**  
 (609) 261-1088

**CAMDEN COUNTY:**  
 Deputy Clerk of the Superior Court  
 Civil Processing Office  
 1st Fl., Hall of Records  
 101 S. Fifth St.  
 Camden, NJ 08103  
**LAWYER REFERRAL:**  
 (609) 964-4520  
**LEGAL SERVICES:**  
 (609) 964-2010

**CAPE MAY COUNTY:**  
 Deputy Clerk of the Superior Court  
 Central Processing Office  
 9 N. Main Street  
 Box DN-209  
 Cape May Court House, NJ 08210  
**LAWYER REFERRAL:**  
 (609) 463-0313  
**LEGAL SERVICES:**  
 (609) 465-3001

**CUMBERLAND COUNTY:**  
 Deputy Clerk of the Superior Court  
 Civil Case Management Office  
 Broad & Fayette Sts., PO Box 615  
 Bridgeton, NJ 08302  
**LAWYER REFERRAL:**  
 (609) 692-6207  
**LEGAL SERVICES:**  
 (609) 451-0003

**ESSEX COUNTY:**  
 Deputy Clerk of the Superior Court  
 237 Hall of Records  
 465 Dr. Martin Luther King, Jr. Blvd.  
 Newark, NJ 07102  
**LAWYER REFERRAL:**  
 (201) 622-6207  
**LEGAL SERVICES:**

**GLOUCESTER COUNTY:**  
 Deputy Clerk of the Superior Court  
 Civil Case Management Office  
 Attn: Intake  
 First Fl., Court House

1 North Broad Street, PO Box 129  
 Woodbury, NJ 08096  
**LAWYER REFERRAL:**  
 (609) 848-4589  
**LEGAL SERVICES:**  
 (609) 848-5360

**HUDSON COUNTY:**  
 Deputy Clerk of the Superior Court  
 Superior Court, Civil Records Dept.  
 Brennan Court House - 1st Floor  
 583 Newark Ave.  
 Jersey City, NJ 07306  
**LAWYER REFERRAL:**  
 (201) 798-2727  
**LEGAL SERVICES:**  
 (201) 792-6363

**HUNTERDON COUNTY:**  
 Deputy Clerk of the Superior Court  
 Civil Division  
 65 Park Avenue  
 Flemington, NJ 08862  
**LAWYER REFERRAL:**  
 (609) 735-2611  
**LEGAL SERVICES:**  
 (609) 782-7979

**MERCER COUNTY:**  
 Deputy Clerk of the Superior Court  
 Local Filing Office, Courthouse  
 175 South Broad St., PO Box 8068  
 Trenton, NJ 08650  
**LAWYER REFERRAL:**  
 (609) 585-6200  
**LEGAL SERVICES:**  
 (609) 695-6249

**MIDDLESEX COUNTY:**  
 Deputy Clerk of the Superior Court  
 Administration Building  
 Third Floor  
 1 Kennedy Sq., PO Box 2633  
 New Brunswick, NJ 08903-2633  
**LAWYER REFERRAL:**  
 (908) 828-0053  
**LEGAL SERVICES:**  
 (908) 249-7600

**MONMOUTH COUNTY:**  
 Deputy Clerk of the Superior Court  
 71 Monument Park  
 PO Box 1262  
 Court House, East Wing  
 Freehold, NJ 07728-1262  
**LAWYER REFERRAL:**  
 (908) 431-5344  
**LEGAL SERVICES:**  
 (908) 866-0020

**MORRIS COUNTY:**  
 Deputy Clerk of the Superior Court  
 Civil Division  
 30 Schuyler Pl., PO Box 910  
 Morristown, NJ 07960-0910  
**LAWYER REFERRAL:**  
 (201) 267-5882  
**LEGAL SERVICES:**  
 (201) 285-6911

**OCEAN COUNTY:**  
 Deputy Clerk of the Superior Court  
 Court House, Room 119  
 118 Washington Street  
 Toms River, NJ 08754  
**LAWYER REFERRAL:**  
 (908) 240-3666  
**LEGAL SERVICES:**  
 (908) 341-2727

**PASSAIC COUNTY:**  
 Deputy Clerk of the Superior Court  
 Civil Division  
 Court House  
 77 Hamilton St.  
 Paterson, NJ 07505  
**LAWYER REFERRAL:**  
 (201) 278-9223  
**LEGAL SERVICES:**  
 (201) 345-7171

**SALEM COUNTY:**  
 Deputy Clerk of the Superior Court  
 92 Market St., PO Box 18  
 Salem, NJ 08079  
**LAWYER REFERRAL:**  
 (609) 678-8363  
**LEGAL SERVICES:**  
 (609) 451-0003

**SOMERSET COUNTY:**  
 Deputy Clerk of the Superior Court  
 Civil Division Office  
 New Court House, 3rd Fl.  
 PO Box 3000  
 Somerville, NJ 08876  
**LAWYER REFERRAL:**  
 (908) 685-2323  
**LEGAL SERVICES:**  
 (908) 231-0840

**SUSSEX COUNTY:**  
 Deputy Clerk of the Superior Court  
 Sussex County Judicial Center  
 43-47 High Street  
 Newton, NJ 07860  
**LAWYER REFERRAL:**  
 (201) 267-5882  
**LEGAL SERVICES:**  
 (201) 383-7400

**UNION COUNTY:**  
 Deputy Clerk of the Superior Court  
 1st Fl., Court House  
 2 Broad Street  
 Elizabeth, NJ 07207-6073  
**LAWYER REFERRAL:**  
 (908) 353-4715  
**LEGAL SERVICES:**  
 (908) 354-4340

**WARREN COUNTY:**  
 Deputy Clerk of the Superior Court  
 Civil Division Office  
 Court House  
 Belvidere, NJ 07823-1500  
**LAWYER REFERRAL:**  
 (201) 267-5882  
**LEGAL SERVICES:**  
 (201) 475-2010

# **Exhibit 4**

**LAW OFFICE OF LAWRENCE A. LEVEN**

175 Fairfield Avenue, Unit 1C  
West Caldwell, New Jersey 07006  
Telephone: (973) 228-5926 Facsimile: (973) 228-4496  
Email: [Lawrence.leven@gmail.com](mailto:Lawrence.leven@gmail.com)  
[Gregory.abramson@gmail.com](mailto:Gregory.abramson@gmail.com)

LAWRENCE A. LEVEN  
GREGORY S. ABRAMSON

May 14, 2014

**Via Fax (609) 826-7069**

Hon. Karen L. Suter  
Burlington County Courthouse  
49 Rancocas Road  
Mont. Holly, New Jersey 08060

Re: Moreno et al. v. Tringali  
Docket No: C32-14

Dear Judge Suter,

Yesterday, pursuant to a court order I received a fed-ex with a verified complaint and order to show cause for the defendant Rory E. Tringali.

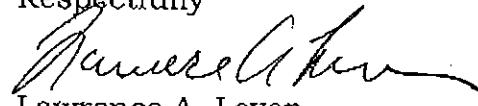
I am not sure what representation Mr. Wolf made to Your Honor, but I can only assume you were misled. I am the former attorney for Mr. Tringali. I represented him for criminal charges which were dismissed by Judge Delehay in December 2012 and a federal civil suit instituted by Mr. Wolf. The civil suit was settled almost two years ago.

Recently I received a phone call from Mr. Wolf alleging a violation of a settlement agreement executed in connection with the civil suit. A copy of his letter and my email response is attached to his moving papers. He requested I contact Mr. Tringali in an attempt to resolve his client's accusations. I specifically told Mr. Wolf that I was not involved, other than passing the message.

I never told Mr. Wolf I would accept service on behalf of Mr. Tringali. Whether the Burlington County Court has jurisdiction remains to be seen, but with respect, there is nothing in R. 4:4-4 which allows an in personam action by substituted service on a party's former lawyer.

I respectfully request that Your Honor revise paragraph 1 of the order to affect service by a different method.

Respectfully



Lawrence A. Leven

LAL/kf  
Cc: Warren S. Wolf  
Via Fax: (856) 651-1615

# **Exhibit 5**

LAW OFFICE OF  
**GOLDBERG & WOLF, L.L.C.**

WARREN S. WOLF\*  
JORDAN B. GOLDBERG\*  
JONATHAN M. ROMVARY\*

1949 BERLIN ROAD  
SUITE 201  
CHERRY HILL, NEW JERSEY  
08003

\*MEMBER NJ & PA BARS

856-651-1600  
FAX 856-651-1615

June 13, 2014

Honorable Karen L. Suter, P.J.Ch.  
Burlington County Superior Court  
Olde Courthouse, 1<sup>st</sup> Floor  
49 Rancocas Road  
Mount Holly, NJ 08060

Re: Michael Moreno and Medpro, Inc. v. Rory E. Tringali  
Docket No. C-32-14  
Order to Show Cause returnable June 20, 2014 at 9:00am.

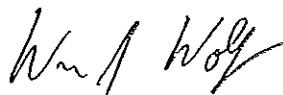
Dear Judge Suter:

Enclosed please find an email we received from Justin Williams indicating that Defendant Tringali has recently publicized Justin William's parents' and wife's personal confidential information including social security numbers, home address, telephone numbers and email accounts. Plaintiff Moreno fears Mr. Tringali may try to obtain and publicize the same pertaining to Mr. Moreno and his family members.

Accordingly, we have added a paragraph 8 to the proposed preliminary injunction sought in this case. Enclosed please find an original and two copies of the revised order for the Court's consideration at the return date for the Order to Show Cause.

We look forward to addressing these issues with the Court next week.

Respectfully submitted,

  
Warren S. Wolf, Esquire  
GOLDBERG & WOLF, LLC

cc: Rory Tringali *w/ enclosures*  
Client *w/ enclosures*

## Warren Wolf

---

**From:** Justin Williams <[lasermedical007@me.com](mailto:lasermedical007@me.com)>  
**Sent:** Saturday, June 07, 2014 9:59 AM  
**To:** Warren Wolf  
**Subject:** Fwd: Justin mom and dad's info

Rory;s recent BS he is now posting info on my family, parents, etc.

Begin forwarded message:

**From:** Federico Jose Rodriguez Rodriguez <[fjrr15@hotmail.com](mailto:fjrr15@hotmail.com)>  
**Subject: Fwd: Justin mom and dad's info**  
**Date:** June 3, 2014 7:59:21 AM CDT  
**To:** Justin Williams <[lasermedical007@me.com](mailto:lasermedical007@me.com)>, Justin Williams <[williamsjustin@me.com](mailto:williamsjustin@me.com)>, Justin Williams <[williamsjustin@mac.com](mailto:williamsjustin@mac.com)>

Inicio del mensaje reenviado:

**De:** rory tringali <[rorytringali@me.com](mailto:rorytringali@me.com)>  
**Fecha:** 3 de abril de 2014 15:04:16 GMT-4  
**Para:** Federico Rodriquez Dominican <[fjrr15@hotmail.com](mailto:fjrr15@hotmail.com)>, Larry Leven Attonery At Law <[lawrence.leven@gmail.com](mailto:lawrence.leven@gmail.com)>  
**Asunto:** Justin mom and dad's info

•••○○ AT&T 

3:02 PM

56% 

< Search

Edit

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**Williams Carol**

Social Security # 383467803

iPhone

(727) 474-7102



---

FaceTime



other

cwilli99@me.com

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home

310 Hickory Lane  
Largo FL 33770  
United States

---

••••• AT&T 

3:03 PM

56% 

 Search

Edit

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## John Vernon Williams

Justins dad

home

(505) 888-3131



mobile

(801) 647-9206



---

## FaceTime



other

islandjvw@gmail.com

---

## Notes

•••oo AT&T

3:03 PM

56% 

 Search

Edit

---

## Brooke Horan Williams

SS- 392-02-0946

iPhone

(512) 529-2929



---

FaceTime



home

zananolan@me.com



work

laserequipmentsales@...



home

218 Cedar Hurst Lane  
Lakeway TX 78737

GOLDBERG & WOLF, LLC  
Warren S. Wolf, Esquire  
1949 Berlin Road, Suite 201  
Cherry Hill, NJ 08003  
856-651-1600  
Attorneys for Plaintiffs

MICHAEL MORENO and MEDPRO, INC.	Plaintiffs,	SUPERIOR COURT OF NEW JERSEY BURLINGTON COUNTY CHANCERY DIVISION
v.		C- 32 -14
RORY E. TRINGALI	Defendant(s).	<b>ORDER ENTERING PRELIMINARY INJUNCTION AGAINST DEFENDANT</b>

**THIS MATTER** having been brought before the Court by Warren S. Wolf, Esquire, attorney for Plaintiffs, Michael Moreno and Medpro, Inc., seeking relief of a preliminary injunction via Order to Show Cause and the Court having considered any papers filed in support and against such relief sought, and having heard oral argument on the return date of the Order to Show Cause and for good cause shown;

**IT IS** on this \_\_\_\_\_ day of \_\_\_\_\_, 2014 **ORDERED** that Defendant, Rory E. Tringali, is preliminarily restrained, enjoined and directed as follows until further order of this Court:

1. Defendant must immediately remove all references to Plaintiffs on the website <http://justin-williams-brooke-horan-williams-laser-fraud-crooks.com> or any other websites upon which the Defendant can control its content.

2. Defendant must cease and desist from defaming the Plaintiffs or attempting to cast the Plaintiffs in a negative light to anyone;
3. Defendant must cease and desist from contacting any of Plaintiffs' customers;
4. Defendant must cease and desist from attempting to contact the Plaintiffs;
5. The Defendant shall not be permitted to be within a one (1) mile radius of the of Moreno's home located at 17 Tuxedo Court, Marlton, New Jersey;
6. Defendants must not defame or disparage Plaintiffs within the business community.
7. Defendant must immediately delete any posts about the Plaintiffs on any community websites, blogs, industry chat rooms, reviews, etc. which cast Plaintiffs in a negative light.
8. Defendant must refrain from trying to obtain, distribute or publicize any personal information about the Plaintiffs or Michael Moreno's family members including, but not limited to, social security numbers, bank account numbers, tax returns, home addresses or telephone numbers, real estate property values, etc.

And **IT IS FURTHER ORDERED** that a true copy of this order shall be served on all parties or counsel of record within \_\_\_\_\_ days hereof.

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Honorable Karen L. Suter, P.J.Ch.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
opposed  
unopposed  
reasons put on record